	Document name Whistleblower Policy	Page number 1 (3)
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Table of Contents

1	Whistleblower Policy.....	1
1.1	Malpractice.....	2
1.2	Who is covered by this protection?.....	2
1.3	What does the protection mean?	2
1.4	Internal and External alarms	3
1.5	Documentation of Investigation.....	3
1.6	Handling of personal data	3
1.7	Procedure in the event of an alarm about malpractices within Linjemontage: .. Fel! Bokmärket är inte definierat.	

1 Whistleblower Policy

The Act (2016:749) on special protection against reprisals for employees who report serious misconduct is intended to provide protection for employees who report misconduct in their workplace. The Act does not regulate the employee's right to raise an alarm per se or the right to criticise the employer or otherwise speak out, but is intended to offer employees who raise an alarm about serious misconduct in the employer's operations special protection against suffering reprisals from the employer. Reprisals include dismissal, but also less intrusive measures during employment, such as reassignment, removal from duties, excessive workloads, ostracism and harassment. To be covered by the protection, the employer's reprisal must be taken because the employee raises an alarm under the law. There must therefore be a clear causal link between the alarm and the reprisal.

In 2019, an EU directive was adopted to create a minimum standard in the EU to protect whistleblowers in areas such as money laundering, public procurement, public health, and consumer protection. A Swedish legislative proposal was presented in June 2020 to implement the EU directive. This policy has been drafted in accordance with the new legislative proposal. It should be noted that this policy may be adjusted once the legislative proposal is finalized. The new law is expected to enter into force on 1 December 2021.

	Document name Whistleblower Policy	Page number 2 (3)
	Issuer LMG Integrity Team	Date 2021-07-01

1.1 Malpractice

The law is aimed at reporting "wrongdoing in which there is a public interest in disclosure." This means that there are relatively high requirements as to the type of irregularities and wrongdoing to be covered by the protection. Workplace disputes, general expressions of dissatisfaction and the like should not constitute wrongdoing covered by the Act's special protection.

The information reported should be of interest to a wider group of people, not just the whistleblower, and there should be a legitimate interest in the information coming to light. Such misconduct in the employer's business includes criminal acts such as fraud, embezzlement, breach of trust, and corrupt acts such as bribery and environmental crime. Other types of misconduct are also covered by the regulation - these should be qualified breaches of applicable standards and regulations or major shortcomings in the business in general. Examples of such malpractices are violations of fundamental rights and freedoms, risks to life, safety and health, and damage to the environment.

1.2 Who is covered by this protection?

The protection extends not only to LMG employees, but also to job applicants, former employees, shareholders active in the company, business partners, consultants and interns, etc. The protection also extends to persons who assist in the reporting process or who are related to the reporting person.

The protection does not apply if a person knowingly reports false information. However, the protection applies even if the information reported turns out to be false if the whistleblower had reasonable grounds to believe that the information was true when it was reported.

The protection of the law does not apply to workers who, by raising the alarm, commit a crime.


1.3 What does the protection mean?

Those who report wrongdoing should not be at risk of reprisals or other negative consequences.

Reprisals includes various forms of punishment, retaliation and reprimands, such as dismissal, reassignment, excessive workload, reduction of benefits, ostracism at work and lack of pay increase. It is sufficient that there is a risk of negative consequences for the reporting person. The risk need not have materialised.

An employer who violates the prohibition of reprisal or who has prevented or attempted to prevent reporting shall be liable to pay damages.

The person appointed to handle the reporting (see below under "Procedure in the event of alarms about malpractices within Linjemontage") is independent in the performance of his/her duties. This means, among other things, that the designated person must be able to independently assess how the information should be handled and that no one can request to see the information that has been reported.

	Document name Whistleblower Policy	Page number 3 (3)
	Issuer LMG Integrity Team	Date 2021-07-01

Employees who are subjected to reprisals by their employer in violation of the law are entitled to both financial and general damages.

1.4 Internal and External Alarms

In order to be covered by the protection against reprisals, it is essential that the employee puts forward concrete allegations of wrongdoing. The protection will apply to both internal and external complaints.

Internal alarms refer to alarms directly to the employer or a representative of the employer or that the employee uses internal routines for reporting that apply at the workplace.

External alarms refer to an employee sounding an alarm by publishing information or providing information for publication, or by contacting an authority. As a starting point, the employee must also first have alerted internally without the employer taking reasonable measures.

1.5 Documentation of Investigation

LMG documents the reporting of misconduct and the actions taken as a result of such reporting. LMG treats all information related to the identity of the reporting person confidentially and in accordance with applicable law.

1.6 Handling of Personal Information

Personal data processed within the whistleblowing system may be of a privacy-sensitive nature. The processing of personal data shall be carried out in accordance with the existing data protection framework. Personal data in a case shall be deleted when they are no longer necessary, but no later than two years after the processing of the data in the case has ended.

1.7 Procedure in the event of alarms about malpractices within Linjemontage

1. Contact the HR Manager Elenore Röing by email or phone and inform her of the misconduct you wish to report. Email: elenore.roing@linjemontage.se or mobile: 0790-605518.
2. The HR manager will document the information provided by the employee and assess how to handle the information further.
3. The HR manager will initiate action in the event of misconduct.
4. The HR manager will give feedback to the person who has reported the incident.
5. If reporting in accordance with the above is deemed not to be possible, reporting may be made directly to the LMG Board. In this case, please report to Hitesh Kumbhat, hitesh.kumbhat@kalpatarupower.se or mobile: 070-250 75 57.
6. If reporting has taken place in accordance with the above and this does not help to remedy the situation, reporting may be made externally to the relevant authority. The relevant authority for LMG's activities will be announced at a later stage once this has been determined by the government.

If you have any questions about the procedure, please contact Elenore Röing, HR.